

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED
conditioned upon the
timely filing of a waiver
of speedy trial by co-
defendant Vincent.

UNITED STATES OF AMERICA

v.

DORIAN AYACHE

)
)
)
)
)
)

No. 3:13-00153-1
JUDGE TRAUGER



MOTION TO CONTINUE TRIAL

Defendant Dorian Ayache respectfully moves the Court to continue the trial set for November 26, 2013, as well as all associated deadlines.

Section 3161(h)(7)(A) of Title 18 provides, in pertinent part, that any period of delay resulting from a continuance granted on the basis of a court's findings that the ends of justice served by granting of a continuance outweigh the best interests of the public and the defendant in a speedy trial shall be excluded in computing the time within which the trial must commence. The factors that a judge shall consider in determining whether to grant a continuance are found at 18 U.S.C. § 3161(h)(7)(B)(iv). One such factor is whether the denial of a continuance would deny counsel for the defendant "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence."

On September 19, 2013, Defendant Dorian Ayache was arraigned on charges of violating Department of Transportation regulations, conspiracy to defraud the government, and tampering with evidence. These charges require substantial factual investigation and research into a specialized area of the law. Because these tasks require an unusual amount of time and might require expert assistance, it will not be possible to properly complete them within the 70-day speedy trial window.